

Case No. 17-CV-08964-GHW

**AFFIDAVIT OF DAVID D. HOLAHAN,  
ESQ. IN SUPPORT OF REQUEST FOR  
CERTIFICATE OF DEFAULT**

3. The time for Defendants Q Lotus, Inc., Q Lotus Holdings Inc. and the Rosenberg Trust, to answer or otherwise move with respect to the complaint has expired.

4. To the best of my knowledge, Defendants are corporations and a trust, and therefore they are not an infant, in the military, or an incompetent person.

5. As set forth in the Affidavits of Service filed by Concheita Richardson (Doc. Nos. 13, 14 and 15), Defendants were properly served with the Summones in this Civil Action, Plaintiff's Complaint for Breach of Promissory Note and Guarantees, and a Civil Cover Sheet on December 8, 2017.

**WHEREFORE**, Plaintiff requests that the defaults by Defendants be noted and a certificate of default issues.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

Dated: February 13, 2018  
New York, New York

By:   
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